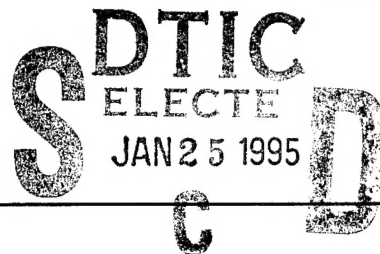


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United States General Accounting Office

Report to Congressional Requesters



December 1994

WOMEN'S EDUCATIONAL EQUITY ACT

A Review of Program Goals and Strategies Needed



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**Program Evaluation and
Methodology Division**

B-256796

December 27, 1994

The Honorable Edward M. Kennedy
Chairman, Committee on Labor
and Human Resources
United States Senate

The Honorable Paul Simon
Chairman, Subcommittee on Employment
and Productivity
Committee on Labor and Human Resources
United States Senate

This report responds to your request that we review the Department of Education's Women's Educational Equity Act (WEEA) Program. First authorized by Public Law 93-380, the Education Amendments of 1974, this program awards grants and contracts to eligible recipients for interventions to (1) provide educational equity for women, (2) help educational institutions meet the requirements of title IX of the Education Amendments of 1972 prohibiting sex discrimination in all educational institutions receiving federal funds, and (3) provide educational equity for women and girls who suffer multiple discrimination based on sex and on race, ethnic origin, disability, or age. WEEA further authorized the Secretary of Education, through the Office of Educational Research and Improvement, to evaluate and disseminate, at low cost, materials and programs developed under this program.

You asked us to address four questions: (1) What interventions were implemented, by whom, for what audiences, and at what costs, and did these activities continue beyond the grant period? (2) Did these activities hold promise of promoting educational equity for women, and did they reflect the requirements of the legislation? (3) How was information about the interventions disseminated, and what lessons do these activities hold for future efforts to spread information widely in this field? (4) How did changes in program administration affect the ability of the WEEA Program to achieve its legislative purpose?

This study reviews activities funded under WEEA between 1986 and 1991, the period for which agency records were available. (No grants were awarded in 1992.) Although the projects we reviewed are representative of those funded over this 6-year period, they probably do not greatly resemble those funded before 1986. For example, continuation grants

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(applications funded for 2 or 3 years) were common in the earlier years (33 of the 55 grants awarded in 1981 were continuation grants), but there were only three continuations in the 6 years from 1986 to 1991.

At the end of this report, we discuss changes in the WEEA Program that were recently enacted as part of the Improving America's Schools Act of 1994. We believe that the most significant findings of this report still apply to the WEEA Program as reauthorized. Thus, this report should be useful to the Department of Education as well as local and state education officials and other potential WEEA applicants.

Background

When last reauthorized in 1988, WEEA authorized the Secretary of Education to award (1) general grants for demonstration, developmental, and dissemination projects of national, statewide, or general significance and (2) challenge grants (not to exceed \$40,000 each) to support comprehensive and innovative approaches to the achievement of educational equity. The Secretary was also authorized to contract for a WEEA Publishing Center to disseminate WEEA products.

The WEEA Program was first funded in fiscal year 1976. Appropriation levels grew steadily, from \$6.3 million at the onset to \$10 million in 1980, but dropped in the following decade. In the years between 1982 and 1992, successive administrations aimed to end the program by not including any funds in the President's budget, but some funds were always reinstated by the Congress. (See appendix I for additional information.)

At one end of the spectrum are supporters who credit WEEA as being responsible for many exemplary projects that have made significant contributions toward attainment of gender equity. At the other end are critics who have described the program as "a money-making machine for a small network of openly radical feminist groups" and one that has not positively affected substantial numbers of women and girls.¹

With the advances achieved by women over the last 20 years, some argue that women's educational equity is no longer an urgent issue. They cite facts such as the achievement of higher rates of promotion and college enrollment by women than by men. Others maintain that equity has yet to be achieved; they cite the overparticipation of women in low-paying jobs, the glass ceiling, and the lack of attention given girls in comparison to

¹See Tom Miraga, "Women's Panel Accused of Abandoning Equity Goal," *Education Week*, Sept. 29, 1982, p. 7, and Theresa Cusick, "A Clash of Ideologies: The Reagan Administration Versus the Women's Educational Equity Act," *Peer*, Summer 1983.

boys by teachers and textbook publishers. (See appendix I for a detailed history of WEEA.)

Objectives, Scope, and Methodology

The scope of our review of WEEA grant activities was limited to the years 1986 through 1992 because project records for activities funded before 1986 were unavailable. There were no general or challenge grants in 1992. Our review was further limited to funded activities because, except for aggregated data, the Department of Education does not maintain records of unfunded applications. Aggregated data include such information as the total number of applications received, the number of applications received by state and geographical region, and the number of applications by type of grant requested. By contrast, our review of WEEA's Publishing Center activities and of the administration of the WEEA Program is based upon information we were able to collect on the program's entire 19 years of experience.

Information for this study was obtained through interviews and document review. We interviewed individuals with current and previous program responsibility and analyzed information from the WEEA Program Office, the Department of Education's Grant and Contract Service Office files, WEEA's Publishing Center, and independent reviews of the program. We also conducted telephone interviews with a random sample of 40 former WEEA grantees. We reviewed 185 applications (184 of which were funded)² and 105 end-of-grant reports³ and independently judged

- their connection to gender equity,
- the statutory priority that appeared to be addressed,
- whether the project appeared to be of local or broader significance, and
- whether plans for and results of evaluations were included.

We performed our work in accordance with generally accepted government auditing standards.

²Of the 185 applications we reviewed, one was not funded because the applicant refused the grant. Twenty-one applications were missing; most of these were eligible for disposition under the Department's 5-year record retention policy.

³We were able to retrieve 51 percent (105 out of 205) of the end-of-grant reports. If one omits reports for 1986-87 grants (which may have been disposed of by the time of our data collection under the Department's 5-year record retention policy), the retrieval rate was 47 percent (50 out of 107). We were unable to determine if the missing final reports had not been provided by grant recipients or if Department officials had received them but were unable to locate them.

Results in Brief

Question 1

In answer to your first question about the interventions funded over the period of this study, we found that the program funded 205 general and challenge grants between 1986 and 1991. Service activities of career counseling, remedial academic instruction, and psychological and supportive counseling were often supported under WEEA. Elementary and secondary school students were the most frequently targeted participants, followed by parents and other adults from outside the schools. In terms of the populations addressed, about half of funded applications were aimed at the needs of racial and ethnic minorities and other disadvantaged groups. Colleges received 36 percent of the grants, nonprofit or community groups received 32 percent, and local education agencies 15 percent.

WEEA operated under annual appropriations averaging under \$3 million during the period studied. General grants averaged \$107,344—about three times the size of the average challenge grant, which was \$32,132. Utilizing a telephone survey of 40 former grantees, we estimated that about half of the projects that provided student services continued after WEEA funding ended, although typically through the support of other federal and state programs.

Question 2

Did the WEEA activities hold promise of promoting educational equity for women, and did they reflect the legislative requirements? The WEEA Program addressed gender equity primarily by providing direct services—academic instruction, career counseling, and some personal support services—to girls and women, apparently to compensate for past and current inequities. There was relatively little emphasis in WEEA projects on identifying gender inequities in the policies and practices of educational institutions and developing remedies for them.

We examined funded projects in light of priorities for “national, statewide, or general significance” and found about half the projects of only local significance. In our view, this is because the Department of Education regulations define “general significance” unnecessarily broadly, which has allowed frequent funding of projects of largely local orientation.

Question 3

How was information disseminated? What lessons were learned about dissemination? The WEEA Publishing Center prepares WEEA products for publication, publishes them commercially, and provides other information and coordination functions. The effectiveness of the Publishing Center is limited by the local nature of many WEEA projects, which makes them less amenable to dissemination. Few WEEA grantees develop products; only about 15 percent of WEEA projects result in commercially available products. Few WEEA projects are evaluated, which means the Publishing Center must distribute products that have not been documented as successful in their original sites.

Question 4

With regard to administration of the WEEA Program, changes since the early 1980s have reduced the program's size, funding, and visibility. WEEA's program staff declined from about six to one and one-quarter positions. Its appropriation fell from \$10 million in 1980 to \$1.98 million in 1994. The position of program director was eliminated, and the program's reporting level within the Department was dropped three levels. One measure of the impact of these changes is the drop in applications from 955 in 1980 to 247 in 1991.

Applications for WEEA grants are scored on four dimensions—plan of operation, impact, need, and staff qualifications—producing possible scores of up to 100 points. Several additional funding requirements have been added over the years. Only one is incorporated into the numerical scores: applicants who have not previously received funding under WEEA or under part C of title IX receive an additional 10 points. Other funding requirements include mandating special consideration for distributing awards geographically, instructing the Department to consider annual funding priorities, funding specific recommended activities, and supporting activities at four levels of education. These additional requirements may have limited the capacity to award grants on the basis of merit. The impact of these added criteria—which are not unusual legislatively—could be substantial because of the number of additional requirements and the small size of the program. In short, the description of the process used to select WEEA grantees suggests that the need to consider so many funding priorities makes the selection process more a mechanical application of rules than a consideration of the better applications.

Implications of Our Results

A program with no director, with a staff of one and one-quarter persons located in two different offices of the Department of Education, and operating under threat of extinction for a decade, WEEA is now in a growth situation with an increase in appropriations from \$1.98 million in fiscal year 1994 to \$3.97 million in fiscal year 1995. Our review suggests a need to revisit WEEA's fundamental goals and strategies if the program is to maximize its effects on achieving educational equity.

Activities funded by WEEA are typically not provided in close association with the schools. The dominant WEEA activities are for direct services—academic instruction, counseling, and personal support services. Such services are apparently needed because gender-based discrimination in the schools is still a problem. Yet one of the three WEEA objectives is to help educational institutions meet the requirements of title IX prohibiting sex discrimination in all educational institutions receiving federal funds. However, we found that only 7 percent of WEEA activities concerned title IX compliance, and we classified only one state or local education agency grant as having title IX compliance as its primary WEEA activity. Further, only 17 percent of WEEA awards were received by state and local education agencies, and we saw little or no evidence that other grantees (such as universities) were working in close partnerships with state agencies or local schools to identify and remedy sex equity problems in the public schools.

WEEA activities thus appear to be out of balance in that too many resources go for direct services to small numbers of persons and too few resources go to eliminate systemic inequitable policies and practices that will affect future generations of girls and women. Department officials need to consider what the educational equity-related needs of women and girls in the 1990s are and what role WEEA should have in meeting them.

Critics of WEEA may argue that there are few substantial problems of sex equity in the schools and colleges and that WEEA funding is unnecessary for either direct service projects or projects aimed at identifying and remedying sex inequities in educational institutions. That debate may be resolved by data to be collected for a mandated report to the President and the Congress on the status of educational equity for girls and women. The reauthorization of WEEA requires this report by January 1, 1999.

Principal Findings

Question 1

Activities Funded by the WEEA Program

Instruction was the most common class of activity funded in the 1986-91 period, accounting for 30 percent of WEEA activities. Supplementary education activities accounted for 28 percent, and personal support, another 24 percent of activities. Professional support accounted for 8 percent of activities, and title IX compliance for 7 percent. (See table 1.)

Table 1: Frequency of WEEA Support of Activities

Activity ^a	Number	Percent
Instruction	120	30
Remedial academic instruction	50	
Teacher and staff training	16	
Instructional materials for students	14	
Teacher instruction guides	13	
Vocational instruction	12	
Enrichment activities	5	
Drop-out prevention activities	4	
Research	3	
Other ^b	3	
Supplementary education	112	28
Career counseling services	70	
Staff training	15	
Teacher guides	12	
Materials for students	8	
Purchase of reference and other materials	5	
Other ^b	2	
Personal support	95	24
Psychological and supportive counseling	32	
Allowances for transportation or day care	18	
Case management services	9	
Staff guides	7	
Staff training	6	
Materials for students	6	
Scholarships	5	
Instruction in parenting skills	5	
Fitness and wellness training	3	

(continued)

Activity ^a	Number	Percent
Other ^b	4	
Professional support	33	8
Professional networking	11	
Professional materials	6	
Research	5	
Conferences	5	
Training	4	
Other ^b	2	
Title IX compliance	27	7
Research studies	9	
Teacher and staff training	8	
Teacher and staff guides	5	
Student materials	3	
Other ^b	2	
General^c	17	4
Total	404^d	101^e

^aMost common activities within each class are listed with their corresponding number of projects.

^bThis category combines several separately coded activities, none of which are as frequently selected as those that are listed separately.

^cThis category includes public address announcements, posters, desk placemats.

^dOmits 21 missing cases.

^eDoes not total 100 percent owing to rounding.

By far the most frequent activity within the **instructional** class was remedial academic instruction. Other popular instruction activities included teacher or staff training, developing instructional materials for students, and teacher instruction guides. About half of the remedial activities are in projects oriented to adults outside the schools and about half are secondary school student projects.⁴

The major **supplementary education** activity was career counseling services, which was mainly offered to students at secondary schools and colleges. The main **personal support** activities were psychological and supportive counseling services and allowances or stipends for

⁴The data in table 1 are based on up to three activities that we derived from the applications. The analysis on the participants in different activities is based on the primary activity only. Primary activities are those that appeared to account for more of the project funds than other activities if more than one activity was included in the application.

transportation or day care. The most common activity in the **professional support** class was networking, while research studies dominated the **title IX compliance** class.

Regarding the 184 funded applications that we reviewed, we found that 38 percent of WEEA projects included career counseling activities, 27 percent included remedial academic instruction activities, and 17 percent included psychological and supportive counseling services. These three activities clearly dominate WEEA funding.

Recipients of Awards

WEEA grants were most frequently awarded to colleges and to nonprofit and community groups as shown in table 2. Local and state education agencies received only 15 percent and 2 percent of the awards, respectively.

Table 2: Type of Recipient of WEEA Awards

Type of recipient	Number of awards	Percent of awards
Colleges	74	36
Nonprofit or community groups	65	32
Local education agencies	30	15
State education agencies	4	2
Individuals	12	6
Tribally chartered	6	3
Other ^a	14	7
Total	205	101^b

^aIncludes municipal agencies, state departments of corrections, and so forth.

^bTotal exceeds 100 percent owing to rounding.

The college-run grants look much like the other grants, differing mainly in that their services are somewhat more likely to be targeted toward postsecondary students and faculties at the postsecondary level and below. We noted earlier that elementary and secondary school students and teachers are much more often the primary audience for WEEA projects than are postsecondary audiences.

Audiences Addressed

The most frequent level of participants targeted was elementary and secondary students (about 36 percent of projects), followed by parents or other nonschool adults (25 percent). About 14 percent of the projects were targeted to elementary and secondary school educators, and about 11 percent to postsecondary students or faculty. (See table 3.)

Table 3: Primary Audience Addressed by WEEA Awardees

Primary audience	Number of awards	Percent of awards
Elementary and secondary students	73	36
Parents, adults, general public	51	25
Elementary and secondary educators	28	14
Postsecondary students	16	8
Postsecondary faculty	7	3
Other	9	4
Missing applications	21	10
Total	205	100

About half of the 51 projects targeting nonschool adults focused their primary activities on instructional services, typically remedial academic instruction (15 projects) and some vocational training (6 projects). The other most common activity for nonschool adult programs was personal support, especially psychological and supportive counseling services (3 projects) and allowances for transportation or day care (3 projects). These adult nonschool projects were primarily serving disadvantaged populations, especially poor, Native American, and minority women.

Table 4 shows that about half of all projects were targeted to some disadvantaged population, often a racial or national origin group. This degree of emphasis of WEEA projects upon disadvantaged persons is surprising in that WEEA can fund projects to provide educational equity for all population groups. However, the pattern of disadvantaged group targets is clearly consistent with one objective of WEEA, which is to provide educational equity for persons suffering multiple discrimination.

Table 4: Extent to Which Disadvantaged Groups Were a Primary Target Population in WEEA Awards

Primary target population ^a	Number of awards	Percent of awards
Minority total	56	27
Unspecified	19	
Native American	18	
African American	8	
Hispanic	8	
Asian	3	
Non-English-speaking	2	1
Low socio-economic status	20	10
Pregnant or parenting	16	8
Physically or mentally disabled	5	2
Female offenders	5	2
Migrants	3	1
Disadvantaged subtotal	107	51
No disadvantaged primary target population	77	38
Missing applications	21	10
Total	205	99^b

^aSome decisions on how to classify the target population were difficult and may appear to create contradictions. "Non-English-speaking" was not included under the Minority category because some programs were aimed at persons of European origin, a class not commonly considered a minority status. Migrants often have low incomes, but we retain the specific target populations of these projects by including migrants as a separate class.

^bTotal differs from 100 percent owing to rounding.

Size and Duration of WEEA Grants

The average WEEA grant in the period was \$76,892, ranging from a low of \$67,422 in 1990 to a high of \$87,586 in 1989. The average general grant was \$107,344, while the average challenge grant was \$32,132. (See table 5.) Only three applications were funded for more than 1 year, and in some cases, services were provided for only a few weeks.

Table 5: Average Amount of WEEA Grants

Fiscal year	Type of grant	Average amount
1986		\$76,502
	Challenge	28,046
	General	93,664
1987		79,104
	Challenge	32,982
	General	125,226
1988		70,072
	Challenge	33,395
	General	104,916
1989		87,586
	Challenge	34,480
	General	125,072
1990		67,422
	Challenge	32,987
	General	120,986
1991		84,437
	Challenge	30,471
	General	106,923
Total		\$76,892
	Challenge	\$32,132
	General	\$107,344

Continuation of Services

Based on telephone interviews with a random sample of 40 former grantees, we found service activities funded by WEEA often appeared to continue beyond the funding period. However, continuation was contingent upon the availability of other outside funding.

The interviewees indicated that almost half of their services funded totally or partially by WEEA (13 out of 29) for the period 1986-91 continued beyond the funding period, largely through the use of funds from other federal and state programs. These types of continuations do not, however, necessarily constitute local institutionalization of federal seed money initiatives in the usual sense of the term. Indeed, we found only two cases where applicants decided to continue services with their own funds. (See table 6.) These findings should be treated as tentative, however, because of the small size of our sample and because we were unable to verify the information that we collected.

Table 6: Continuity and Availability of WEEA-Supported Services and Products^a

WEEA activity	Student services	Product development
Number of grants	29	18
Number providing proposed activity	29	15
Number continued after WEEA funding terminated	13	13
Source of support for continued services or products	Funded by other federal programs—4 Funded by multiple (federal, state, or private) sources—6 Funded by the grant recipient—2 Continued through volunteer efforts—1	Available through the WEEA Publishing Center—4 Published by other commercial publisher—2 Disseminated by recipient—7

^aThis table was derived from the telephone interview responses of 40 former WEEA grantees. The number of activities exceeds 40 because some proposed more than one activity or product. Three teacher or staff training activities are omitted.

About 70 percent of applicants who reported they were funded to develop materials (13 of 18) did produce a product and continued to offer the product to interested audiences. Interviewees reported that they disseminated many of these materials themselves. We do not have data on the quality or utility of these products.

Question 2

Did WEEA Promote Gender Equity?

The purposes of the act include (1) "to provide educational equity for women in the United States," (2) "to provide financial assistance to enable educational agencies and institutions to meet the requirements of title IX," and (3) "to provide educational equity for women and girls who suffer multiple discrimination, bias, or stereotyping based on sex and on race, ethnic origin, disability, or age" (P.L. 100-297).

As noted earlier, most WEEA projects provided academic instruction, career counseling, and personal support services to girls and women students. In this way, they apparently hoped to provide girls and women with services to compensate for past—and possibly current—educational inequities.

We identified a group of 46 projects that provided services to disadvantaged adults outside the schools, which represented about 25 percent of the WEEA projects.⁵ We found that 35 of these projects had primary activities of instruction or personal support. These projects were presumably directed toward the third purpose of the act—services to victims of multiple discrimination. However, it was sometimes unclear in both the applications and in the reviewer comments written on the application review sheets whether the concern was with multiple discrimination (including gender) or with economic hardships facing the women. For example, a WEEA grant helped establish an educational resource center for adult women, particularly minority women, to help compensate for educational gaps associated with the closing of the Prince Edward County, Virginia, public schools in 1959-63 in protest over school desegregation. In this case, both men and women were victims because the discrimination was based upon race and both men and women faced resulting economic hardships.

Returning to table 1, we found relatively little emphasis on identifying gender inequities in schools and colleges and on developing remedies for these inequities. That may be the goal of many of the WEEA activities for teacher or staff training and activities related to developing instruction materials for students and teacher guides. However, those activities were also not very common, representing 17 percent of the specific activities listed within table 1. An additional class of activity aimed at developing remedies for sex inequities is compliance with title IX, but these represented only 7 percent of all activities.

If the focus of the WEEA Program were on identifying gender inequities and developing remedies, we might expect many awards to be made to local and state education agencies because they have the authority to implement procedures and programs that affect present and future generations of students. However, as we noted earlier, state and local education agencies received only 17 percent of the WEEA awards in this period. Further, we found only one education agency project (representing 4 percent of all education agency grants) in which the primary activity was title IX compliance. In fact, education agency recipients of WEEA awards were less likely than other recipients to have title IX compliance as the primary activity. (See table 7.) One possible explanation would be that there were partnerships of some sort in which universities and community

⁵We found 25 percent of the projects (46 of 184) targeted disadvantaged adults outside the schools. The denominator excludes the 21 missing applications. We did not count pregnancy and parenting activities as directed at disadvantaged adults; some may have been, but we were unable to determine that.

groups identified problems and helped public schools institutionalize solutions, but we saw few joint approaches, and the combined effects of small awards and the small likelihood of continued WEEA funding seem to make such partnerships unlikely.

Table 7: Primary Activity of WEEA Grants by Type of Recipient

Primary activity	Grant recipient	
	Local and state education agencies	All others
Instruction	39%	34%
Supplementary education	32	22
Personal support	18	17
Title IX	4	12
Professional support	0	9
General	7	6
Total	100%	100%

In summary, it appears that WEEA promoted gender equity primarily by providing academic instruction, career counseling, and some personal support services that were not available or not sufficiently available in schools and, to a lesser extent, colleges.

Did WEEA Meet Legislative Requirements?

We focused our review of legislative requirements on the priority the WEEA legislation gives to funding projects of “national, statewide, or general significance” and on the various funding criteria that emphasize the support of specific types of activities and categories of applicants.

As noted earlier, WEEA appropriations have never reached the level specified in the legislation to allow for funding of projects of local significance. Thus, all WEEA projects are to be of “national, statewide, or general significance.” Under the law, presumably, demonstration, developmental, or dissemination activities would serve to diffuse the lessons from projects with national, statewide, or general significance.⁶

According to Department of Education regulations, a project of general significance includes any project whose “potential impact is not confined to a local area.” Since almost any project could have the potential for some impact outside its local area—if only through informal discussion with a few people from another state—the Department’s interpretation appears

⁶The act does not define what is meant by the phrase “national, statewide, or general significance,” nor does it define “demonstration, developmental, and dissemination activities.”

to limit any priority for projects of national, statewide, or general significance.

We found only 28 percent of the funded applications we reviewed had proposed activities that held promise of significance at the national level. We considered activities that included demonstration, developmental, and dissemination components or that provided services for individuals from several states as having promise of national significance. We determined that 20 percent of funded projects were of potential significance at the state level in that services were provided in more than one site within a state or some other broad geographical area.

The remaining 52 percent of the projects in our review of WEEA awards (and 58 percent of the projects in our telephone sample) appeared to be primarily of local significance. These projects proposed services for individuals within a given locality and did not include formal demonstration, developmental, or dissemination components that would enable the diffusion of project activities and accomplishments. Such projects are unlikely to influence practices at external sites and, therefore, hold little promise of general significance.

For example, a 1991 grant was awarded to fund continuing education services, including English and mathematics instruction, instruction in life skills (for example, balancing a checkbook), and General Education Diploma tutoring, for 100 Native American women living within a reservation. Services were funded for a year, and the applicant did not propose demonstration, developmental, or dissemination activities. This project was typical of many WEEA projects in terms of its local orientation and targeting of needy adult clients.

With regard to the question of the WEEA funding requirements, we noted earlier that the legislation specifies awards for general and challenge grants. Beginning in 1978, the legislation also required the Secretary to set criteria and priorities for awarding funds. Accordingly, the Secretary allocates funds to each priority selected. The initial five priorities were title IX compliance, providing equity for racial and ethnic minorities, providing educational equity for disabled women and girls, influencing leaders in educational administration and policy, and eliminating barriers to equity. From 1991 to 1993, only one priority was selected: programs to increase the participation of women in instructional courses in mathematics, science, and computer science. (The priorities for each year are shown in tables I.1 and I.2 in appendix I.)

In addition to the two types of grants and the annual funding priorities, WEEA calls for the Secretary to make awards to applicants proposing activities at four levels of education and in six specific subject areas. The Department of Education has classified the four levels of education for funding as preschool, elementary and secondary, higher education, and adult education. WEEA identifies the six specific grant subject areas as (1) the development and evaluation of educational materials; (2) model training programs for educational personnel; (3) research and development activities; (4) guidance and counseling; (5) educational activities to increase opportunities for adult women, including underemployed and unemployed women; and (6) educational activities to increase support for women in vocational education, career education, physical education, and educational administration.

The act also mandates "special consideration" be given to grant applicants "on the basis of geographic distribution throughout the United States" and to applicants that have not received previous grants under WEEA or part C of title IX. The Department of Education also attempts to ensure that it funds one of each type of grantee each year.

In summary, there are many requirements that govern the allocation of grants besides the merit of the proposals. We discuss the operation of these requirements in a later section.

Question 3: Products and Dissemination

Many federal programs like WEEA that must address widespread problems with only modest funds are often identified as demonstration, developmental, or dissemination efforts. That is, ideas and solutions developed and demonstrated in one WEEA location may do two things: help educational equity in the original site (through direct project activities) and also be useful in other locations if the projects are sound and transferable. Such diffusion can happen in many ways, both informally and through explicit efforts. Under WEEA, diffusion efforts are encouraged but not required, and the WEEA Publishing Center helps grantees bring products to market and publishes them. In addition, the Publishing Center produces a quarterly digest and monographs to spread knowledge of issues and research in the area of gender equity.

Two independent estimates suggest that about 15 percent of WEEA projects resulted in commercially published products. The first estimate of the production of commercially published products is from table 6 and is based on our interviews with 40 grantees. The second estimate was

derived from our review of the origin of products in the WEEA Publishing Center catalog.

The Publishing Center encourages grantees to submit products to the National Diffusion Network, a program operated by the Department of Education to disseminate information describing educational programs documented as exemplary through rigorous evaluation. However, WEEA products rarely have such evaluations, and only a few WEEA products have been submitted to the National Diffusion Network.

Despite declines in WEEA funding and associated declines in funded projects, the demand for WEEA products as shown in annual sales has not decreased proportionally. (See table 8.) However, each year the Center has published products from only an average of 7 to 8 projects since its beginning in 1977 through 1992, and unit sales remain small.

Table 8: Year-End Sales for WEEA Publishing Center Products

Year^a	Sales^b
1978-79	\$31
1979-80	119
1980-81	138
1981-82	96
1982-83	114
1983-84	81
1984-85	105
1985-86	172
1986-87	116
1987-88	113
1988-89	105
1989-90	135
1990-91	125
1991-92	109
Average	111
Total	\$1,559

^aThere were no sales in 1977-78.

^bIn thousands of dollars.

The Publishing Center's ability to disseminate information gained through WEEA-funded interventions has been limited by the fact that WEEA does not require applicants to produce materials and by the focus of WEEA funding

on service activities and on activities of local significance that are not easily adapted to dissemination. The lack of sound evaluations of WEEA interventions means the Publishing Center must distribute products that have not been documented as successful in their original sites.

Question 4: Changes in Program Administration

WEEA's survival was in doubt throughout the 1980s. In 1981, the Reagan administration asked the Congress to eliminate the program by folding it into an educational block grant. When this request was unsuccessful, the administration, beginning in 1981, requested no appropriations for the program. The Congress appropriated funds each year, but below the 1980 level. These years were also marked by personnel decisions that downsized the professional staff of the WEEA Program from six (in 1981) to one and one-quarter (in 1988 through the present) and downgraded the reporting level of the program. Until the early 1980s, WEEA had a director who reported to the Assistant Secretary for Elementary and Secondary Education. At the time of our data collection, there was no director and the program was three organizational levels below the Assistant Secretary.⁷

Attempts to eliminate the WEEA Program continued under the Bush administration, and it appeared that the program would be phased out by 1993. The Congress accepted the Department's fiscal year 1992 funding request of \$500,000 to support the Publishing Center only. (No new grants were awarded that year.) The administration requested no funds for WEEA for fiscal year 1993. Again, however, an appropriation was restored by the Congress at the level of \$1.98 million.

The Clinton administration requested and received an increase in the WEEA appropriation from \$1.98 million in each of fiscal years 1993 and 1994 to \$3.97 million in fiscal year 1995. No changes in the reporting level or the personnel resources for the program were requested or received.⁸ Some programmatic changes will be required owing to the recent legislation reauthorizing WEEA, but it is not clear whether the Department will make fundamental changes in the design and implementation of the program.

⁷WEEA is located in the National Programs and Activities Branch, Equity and Educational Excellence Division, Office of School Improvement Programs. Seven offices report to the Assistant Secretary for Elementary and Secondary Education.

⁸The reauthorization of WEEA does require cooperation between staff of the WEEA Program and the Office of Educational Research and Improvement on research activities.

Current Program Administration

The WEEA Program is currently administered by two mid-level professionals. One is assigned to the Department of Education's Office of School Improvement Program, with full-time responsibility for grant solicitation, awards, and project oversight. The other is assigned to Education's Office of Educational Research and Improvement and spends an average full-time-equivalency of 25 percent administering the Publishing Center contract and overseeing the operations of the Center.

WEEA's project-to-program officer ratio has increased over the past decade, and present staffing is insufficient to provide much technical assistance to grantees. When the WEEA Program had a professional staff of six, one program officer staffed about 15-16 projects. In the period 1988-91, the project-to-program officer ratio was about one program officer for every 22 projects. Yet over the later period, many grantees were newcomers to WEEA (because of the special consideration for new applicants) and thus were more likely to need help than more experienced applicants. Further, the large number of missing end-of-grant reports (and the missing evaluation material that these reports should have included) indicates lapses in project oversight.

Process of Selecting WEEA Awardees

As part of our examination of WEEA program administration, we reviewed the process by which WEEA applications were scored and funding decisions made. We based this analysis on a sample of original project applications and related information on those applications from WEEA files, including reviewer comments and scoring. We also discussed the process of application review in detail with program officials.

In an earlier section, we noted the two types of grants (challenge and general) and the provisions to ensure that awards are made to various categories of applications. At the beginning of each funding cycle, the Secretary selects one or more funding priorities. The Secretary approves an initial allocation of funds for each priority and for "other authorized activities" as well as an estimate of funds available for challenge and general awards. This information and the estimated number of awards for each type of grant are made public.

In a year in which there is one priority, there would be four competition groups (priority area challenge, priority area general, "other" challenge, and "other" general). Applicants indicate the competition group for which they are applying. When applications are received, a panel of two or three reviewers is set up for each competition group. The panel assigns scores to each application received in the competition group. Department

officials are present at each panel and seek to standardize the review and scoring across the panels.

Applications are scored on four dimensions (and subscores within each dimension). The four dimensions with maximum total points are: plan of operation (40), impact (24), need (20), and staff qualifications (16). In addition to these 100 possible points, challenge applications receive up to 5 points on extent of innovation. For both classes of award, applicants who have not previously received funding under WEEA or under part C of title IX receive an additional 10 points.

After the applications are scored, a list of applicants for each competition is produced, as is a consolidated list of all applicants. Department officials select for funding the highest rated application from each of the 10 Department of Education regions. The remaining applications are arrayed against the various requirements, as summarized in table 9.

Table 9: WEEA Award Priorities

Funding criterion	Definition	Target
Selected funding priority	Initial dollar allocation by priority Initial estimate of number of awards by priority	Determined by the Secretary
Type of award (general, challenge)	Initial dollar allocation by type of grant Initial estimate of number of awards by type of grant	Determined by the Secretary
Geographical region	One award for each of 10 geographical regions	10 awards
Level of education addressed	One award each for preschool, elementary and secondary, postsecondary, and adult education	4 awards
Classes of activities proposed	One award each for education materials; model training projects; research and development activities; activities for underemployed and unemployed women; and programs and activities for women in vocational, career and physical education, and educational administration	6 awards
Type of grantee	One award each for local education agencies, state education agencies, postsecondary education institutions, nonprofit organizations, and individuals	5 awards

The initial selection of the 10 regional awards meets the geographic distribution requirement, but arraying the remaining requirements against the ranked applications calls for a complex selection process. (See table 9.) According to Department officials, there is no standard approach after the selection of the 10 regional awards. Even the separation of the competitions may or may not be retained as the selection proceeds.

Table 10 shows the number of general and challenge grant applications and awards for a 5-year period (with no breakdown by priority funding areas, which vary in number).

Table 10: Number of WEEA Applications Submitted and Funded

Applications	1987	1988	1989	1990	1991
Submitted					
Challenge	72	71	20	26	38
General	313	278	181	240	209
Funded					
Challenge	16	19	12	14	5
General	16	20	17	9	12

Only between 5 and 20 applications were funded each year for each grant type. Given the small number of actual awards, it appears that more funding criteria were established than could have been meaningfully met if the Department were to limit awards to higher scoring applicants. Another way of viewing the results of this process is to subtract the 10 regional awards from the total number of funded awards shown in table 10. In the 1988-91 period, that left a range of 7-29 remaining awards to be determined after the regional selections.⁹

The Department of Education takes these various requirements seriously. Lists with categories similar to table 9 are prepared each year for the actual awards, showing the extent to which the various targets are met. But there are so many requirements that they cannot be achieved with uniformity. For example, with regard to the initial allocations estimating the number of awards of each type, we found a median difference of 25 percent between the projected and actual number of general and challenge grants. We also found some evidence to question the meaning of at least one of the requirements—funding priorities. Based on our interviews with Department officials, we understand that the applicants' decision to apply under the selected priorities or "other" class is not questioned. However, in reviewing a sample of proposals for priority and other awards, we were often unable to see differences between the activities proposed under the two groups.

It appears that the Department limited the number of new grantees more through a substantial reduction in the number of multiyear (or

⁹This range is derived by adding the challenge and general awards and subtracting 10. The results, starting with 1988, are 29, 19, 13, and 7. We omit the year 1987 from this analysis because the legislation mandating the special consideration for geographic distribution was enacted in spring 1988.

continuation) awards than through rejection of applications by former grantees. We noted earlier that there were only 3 continuation awards out of 205 awards, or 1.5 percent, in the period of our study. In comparison, 125 of the 383 awards made between 1977 and 1982 (33 percent) were continuations.¹⁰ We also looked at the number of new, noncontinuation grants awarded to individuals who had been funded previously during each of these two 6-year periods. In both periods, about 14 percent of awards were to recipients who had been previously funded.¹¹ Of course, applicants may have anticipated a low likelihood of repeat funding, and few may have applied. The practice favoring one-time funding of single-year awards allows more applications to be funded, but it discourages the development of expertise and the refinement of approaches.

The many funding requirements, when applied to the WEEA Program during a period of modest appropriations and diminishing pools of applicants, may have limited the capacity to award grants on the basis of merit. Although we did not conduct a statistical analysis of the relative influence of total score and the additional requirements (shown in table 9) in determining which applications are funded, it appears that the Department gives serious attention to the additional requirements. The impact of these added criteria—which are not unusual legislatively—could be substantial owing to their large number and the small size of the WEEA Program. The description of the process for selecting WEEA grantees suggests that the need to consider so many funding priorities makes the selection process more a mechanical application of rules than a consideration of the better applications.

Implications and Conclusions

A program with no director, a staff of one and one-quarter persons located in two different offices of the Department of Education, and operating under threat of extinction for a decade, WEEA now has a substantial appropriation increase. Our review suggests a need to revisit WEEA's fundamental goals and strategies.

¹⁰We used the years 1977 through 1982 for comparison because data were not available for the years 1983 through 1985.

¹¹For this analysis, a continuation grant counted as one award. From 1986 to 1991, 28 of 203 new grants (14 percent) went to former recipients for the same period. From 1977 to 1982, 37 of 258 new grants (14 percent) were awarded to previous grantees during those 6 years. It would have been preferable to examine repeat funding for the entire duration of the WEEA Program, but we did not have the resources to do the extensive data collection and aggregation that such an analysis would have required.

WEEA was enacted 20 years ago out of a concern that girls and women were being subjected to fundamental institutional discrimination including school counseling that steered girls away from higher paying "male" careers, sex biases in textbooks and other curriculum materials, and discrimination in admissions by postsecondary institutions. In the 1986-91 period, we found WEEA provided relatively little funding of activities to eliminate such problems in educational institutions. Instead, projects typically provided short-term direct services, often career counseling, remedial and other academic instruction, and personal support services, such as psychological counseling, that were not integrated with on-going school-based activities.

Activities funded by WEEA are typically not provided in close association with the schools. The dominant WEEA activities—academic instruction, counseling, and personal support services—are apparently needed because gender-based discrimination in the schools is still a problem. Yet one of the three WEEA objectives is to help educational institutions meet the requirements of title IX prohibiting sex discrimination in all educational institutions receiving federal funds. However, we found that only 7 percent of WEEA activities concerned title IX compliance, and we classified only one state or local education agency grant as having title IX compliance as its primary WEEA activity. Further, only 17 percent of WEEA awards were received by state and local education agencies, and we saw little or no evidence that other grantees (such as universities) were working in close partnerships with state agencies or local schools to identify and remedy sex equity problems in the public schools.

WEEA activities appear to be out of balance in that too many resources go for direct services to small numbers of persons and too few resources go to eliminate systemic inequitable policies and practices that will affect future generations of girls and women. Department officials need to consider what the educational equity-related needs of women and girls in the 1990s are and what role the WEEA Program should have in meeting them.

Critics of WEEA may argue that there is another possibility, that there are few substantial problems of sex equity in the schools and colleges and that WEEA funding is unnecessary for either projects like those we examined or projects aimed at identifying and remedying sex inequities in educational institutions. That debate may be resolved by data to be collected for a mandated report to the President and the Congress on the status of

educational equity for girls and women. The reauthorization of WEEA requires this report by January 1, 1999.

We noted earlier that the legislation sets a priority for projects of "national, statewide, or general significance," but that only 28 percent of the funded applications we reviewed had proposed activities that held promise of significance at the national level. One consequence of this finding is that the pool of WEEA projects available as good candidates for dissemination through the WEEA Publishing Center is very restricted. The Department of Education argued that the act does not define these terms, and the Department considers any project whose "potential impact is not confined to a local area" as a project of general significance. One result is that the legislative priority on disseminating effective practices in promoting sex equity in education has been limited.

The absence of evaluation information on past WEEA projects means that the program is left with little evidence of their effectiveness in eliminating sex bias in education. If the program is redirected, it should collect such information as a guide toward funding more successful programs. One result should be that WEEA would build up a base of projects with some documented effectiveness in eliminating sex bias in education.

We discussed our findings and their implications for the then-pending reauthorization of WEEA with your Committee staff. In October 1994, the Congress passed this reauthorization as part of the Improving America's Schools Act of 1994 (commonly referred to as the reauthorization of the Elementary and Secondary Education Act). The President signed this as Public Law 103-382 on October 20, 1994.

The structure of general and challenge grants along with a dissemination function implemented through the WEEA Publishing Center appear to be substantially changed by the act. Two program types are specified: (1) awards to develop and implement model equity programs and (2) awards for support and technical assistance. At least two-thirds of funds appropriated each year must be for the first type of award, which may be similar to the general grants we studied.

The legislative language on dissemination and the priority for funding projects of national and statewide significance that had applied to the WEEA Program are gone. It appears that the dissemination approach—relying upon WEEA projects as a source of information on effective gender equity practices and in turn packaging and disseminating

that information—has been replaced (or at least modified) by an emphasis on technical assistance and research and development. One form of support and technical assistance is awards “to implement effective gender-equity policies and programs at all educational levels.” The second form is research and development awards “designed to advance gender equity nationwide and to help make policies and practices in educational agencies and institutions, and local communities, gender equitable.” Research activities are to be coordinated with the Office of Educational Research and Improvement. The act provides separate extensive lists of specific examples of each of these two forms of support and technical assistance. Among its other requirements, the act mandates that the activities “are administered within the Department by a person who has recognized professional qualifications and experience in the field of gender equity education.”

Matters for Congressional Consideration

The Congress should weigh whatever benefits it perceives from the various funding requirements—such as the special consideration for applicants who have not received assistance under WEEA or under part C of title IX of the Elementary and Secondary Education Act and the requirements for a geographical distribution of awards—against any drawbacks of those provisions. In this small program, the multiplicity of funding requirements may make the grant award process too mechanistic and may reduce the likelihood that higher scoring applications would be funded.

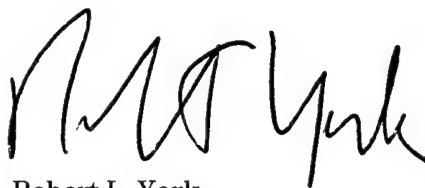
Recommendations

We recommend that the Secretary of Education revisit the fundamental goals and strategies of the WEEA Program. The doubling of the WEEA appropriation makes it particularly important to steer resources away from local delivery of direct services and toward the broader elimination of inequitable policies and practices that may otherwise affect future generations of girls and women. Finally, the Secretary should take steps to ensure that the program is supported by adequate evaluation of funded projects and sufficient administrative support.

Agency Comments

We requested and received comments on a draft of this report from the Department of Education, which generally reaffirmed its belief in the WEEA activities and projects it has funded over the years. The full text of their comments and our response to them are in appendix II.

We will be sending copies of this report to the Secretary of Education and to other interested parties. Copies will also be made available to others upon request. If you have any questions or would like additional information, please call me at (202) 512-5885. Other major contributors to this report are listed in appendix III.

A handwritten signature in black ink, appearing to read 'R. L. York', is positioned above the printed name.

Robert L. York
Director of Program Evaluation
in Human Services Areas

History of the WEEA Program

Legislative History

Special Projects Act of the Education Amendments of 1974

Under the sponsorship of Representative Patsy T. Mink and then-Senator Walter F. Mondale, the Congress enacted WEEA in 1974 as part of the Special Projects Act included in the Education Amendments of 1974. The WEEA legislation authorized the Commissioner of Education (later, with the creation of the Department of Education, the Secretary) to award funds by grants and contracts to individuals, public agencies, and nonprofit organizations for an extremely broad range of activities to provide educational equity for women. The act specified that these activities include

- the development, evaluation, and dissemination of curricula, textbooks, and other educational material;
- preservice and in-service training for educational personnel;
- research, development, and other activities designed to advance educational equity;
- guidance and counseling activities, including the development of bias-free tests;
- educational activities to increase opportunities for adult women; and
- the expansion and improvement of educational programs and activities for women in vocational education, career education, physical education, and education administration.

The authorization included several stipulations:

- All projects receiving grants must fall into one of two categories: one was a general range of activities including the six areas described above and the other was small grants (not to exceed \$15,000) that funded “innovative approaches” for the achievement of educational equity for women and girls.
- Applicants were required “to set forth policies and procedures which ensure adequate evaluation of the activities intended to be carried out under the application.”
- All supported activities had to be administered or supervised by the applicant.
- All supported activities had to show promise of making substantial contribution toward attaining the purposes of the act.

WEEA established a National Advisory Council on Women's Education Programs within the Office of Education. The Council consisted of: 17 members appointed by the President and confirmed by the Senate for terms of 3 years; the Chairman of the Civil Rights Commission; the Director of the Women's Bureau of the Department of Labor; and the Director of the Women's Action Program of the former Department of Health, Education, and Welfare. The Council was responsible for advising the Commissioner of Education on general matters regarding gender equity, recommending how funds be allocated, and developing criteria for the establishment of program priorities.

Education Amendments of
1978

WEEA was reauthorized in 1978 as title IX, part C of the Elementary and Secondary Education Act. The amendments included several notable changes. First, language describing the purpose of the act was expanded to include providing financial assistance to enable educational agencies and institutions to meet the requirements of title IX of the Education Amendments of 1972. Second, the Commissioner was directed to establish funding priorities. Third, the ceiling for the small grant program was raised to \$25,000. Fourth, prior language stipulating that funds shall be used for the six activities listed above was broadened with new language stating that funding may be used for activities in these areas.¹ Finally, priority was given to demonstration, developmental, and dissemination activities of national, statewide, or general significance.

WEEA Amendments of
1984

The 1984 WEEA amendments included two changes. First, the stated purpose of the act was expanded with the following language:

"it is also the purpose of this part to provide educational equity for women and girls who suffer multiple discrimination, bias, or stereotyping based on sex and on race, ethnic origin, disability, or age."

Second, the small grant program was replaced with a challenge provision, which authorized the Secretary to award grants of up to \$40,000 to activities

¹In addition, the law authorized grants of local significance to assist school district and other institutions in meeting title IX requirements. The implementation of this program was dependent upon the level of WEEA's appropriation. Once WEEA's funding reached \$15 million, all money beyond this amount was to be directed for projects of local significance. (Although the triggering funding level was reduced in subsequent reauthorizations, WEEA's funding never reached the level required to implement this provision. A high of \$10 million was reached in 1980, and funding declined steadily thereafter.)

“to develop comprehensive plans for the implementation of equity programs; innovative approaches to school community partnerships; new dissemination and replication strategies; and other innovative approaches to achieving the purposes of WEEA.”

Finally, the act required the Secretary to ensure that at least one grant or contract was available during each funding year to support each of six activities authorized in the 1974 amendments.

Hawkins-Stafford Amendments of 1988

The Hawkins-Stafford Elementary School Improvement Act of 1988 further amended WEEA. First, the act abolished the National Advisory Council on Women’s Educational Programs. Second, it required “special consideration” for applicants who had not received previous funding under the WEEA Program or under part C of title IX of the Elementary and Secondary Education Act of 1965 and for proposals from applicants on the basis of geographic distribution. Third, the act emphasized that activities be funded at all levels of education, including preschool, elementary and secondary education, higher education, and adult education. Finally, the act transferred responsibility for publication and dissemination of WEEA products from the Office of Elementary and Secondary Education to the Office of Educational Research and Improvement.

Regulatory Developments

The 1980 WEEA Regulation

In response to the new statutory requirement that the Secretary set funding priorities, the Department of Education issued regulations in 1980 that established five priorities and a sixth category: “other authorized activities.”² Under the rules, the Secretary would select one or more of these priorities and allocate funds to each. Remaining funds would be allocated to the “other” category. Applicants would compete only against others who chose to compete under the same selected priority. Applicants who did not indicate a priority or who addressed a priority that was not selected by the Secretary competed in the “other” category. Thus, several competitions were conducted annually, one for each of the announced priorities and one for applicants competing under “other.”

²45 C.F.R. part 1601.

Appendix I
History of the WEEA Program

Beginning in 1982, small grant applicants also were required to select a priority, resulting in separate competitions for each priority area and “other” for both general and small grants. Table I.1 displays the announced and established priorities for the years 1981-88.

Table I.1: WEEA Funding Priorities From 1981 to 1988^a

Model projects	1981	1982	1983	1984	1985	1986	1987	1988
Title IX compliance	X	X	X	X	X	X	X	
Providing educational equity for racial and ethnic minorities	X	X	X	X	X			
Providing educational equity for disabled women and girls	X	X	X	X	X			
Influencing leaders in educational policy and administration	X	X						
Eliminating persistent barriers to educational equity for women	X	X	X	X	X			X

^aAn “X” denotes the annual priorities selected by the Secretary.

The 1989 WEEA Regulation

In 1989, the Department published a new regulation with six new priorities that replaced the 1980 priorities.³ The “other authorized activities” category was retained. As before, the Secretary was to select one or more priorities from this list and conduct various competitions for each priority selected and for those classified as “other” for both challenge and general grants. Table I.2 displays priorities announced for 1989 through 1994.

A comparison between the funding priorities established by the 1980 WEEA Regulation and the 1989 WEEA Regulation indicates a change in the Department’s goals for the WEEA Program. The 1980 funding priorities emphasized the development of model programs to provide educational equity for women and girls, including those who are members of minority groups or disabled. The funding priorities established by the 1989 regulations call for the development and expansion of programs that increase opportunities for women, including those who experience multiple discrimination, and tend to narrow WEEA’s focus to specific curricular areas such as mathematics and career education.

³34 C.F.R. parts 245, 246, 247, and 745.

Appendix I
History of the WEEA Program

Table I.2: WEEA Funding Priorities From 1989 to 1994^a

Projects	1989	1990	1991	1992 ^b	1993	1994
Develop and test model programs and materials that could be used by local educational agencies and other entities in meeting title IX requirements						X
Develop new educational programs, training programs, counseling programs, or other programs designed to increase the interest and participation of women in instructional courses in mathematics, science, and computer science			X		X	X
Develop new educational programs, training programs, counseling programs, or other programs, or expand existing model educational programs, designed to enhance educational achievement for women who are economically disadvantaged		X				
Develop or expand guidance and counseling programs designed to increase the knowledge and awareness of women regarding opportunities in careers in which women have not significantly participated						
Develop new educational programs, or expand existing model programs, designed to reduce the rate at which women drop out of formal education and encourage women dropouts to resume their education		X				
Develop new educational programs, or expand existing model educational programs, designed to enhance opportunities for educational achievement by women who suffer multiple discrimination on the basis of sex and race, ethnic origin, age, or disability	X	X				

^aAn "X" denotes the annual priorities selected by the Secretary.

^bNo priorities were selected in 1992 because grants were not awarded that year.

Funding History

Historically, the WEEA Program has been funded at very low levels. It was funded first in 1976 with an appropriation of \$6.27 million. Its appropriation grew steadily through 1980 to a high of \$10 million in that year. Support for the WEEA Program declined in the 1980s. These years witnessed several attempts by successive administrations to devolve the program through zero budgeting. The Congress restored funding during the appropriation process, but WEEA appropriations fell steadily. The level of WEEA's authorizations and appropriations by fiscal year is listed on table I.3.

Appendix I
History of the WEEA Program

Table I.3: WEEA Authorization and Appropriation Levels

Fiscal year	Authorization ^a	Appropriation ^a
1976	\$30,000	\$6,270
1977	30,000	7,270
1978	30,000	8,085
1979	30,000	9,000
1980	80,000	10,000
1981	80,000	8,125
1982	6,000	5,760
1983	6,000	5,760
1984	6,000	5,760
1985	10,000	6,000
1986	12,000	5,740
1987	14,000	3,500
1988	16,000	3,351
1989	9,000	2,949
1990 ^b		2,098
1991 ^b		1,995
1992 ^b		500
1993 ^b		1,984
Total		\$94,147

^aIn thousands of dollars.

^bThe 1988 amendments did not establish authorization levels for fiscal years 1990-93.

Comments From the Department of Education

Note: GAO comments supplementing those in the report text appear at the end of this appendix.



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

JUN 13 1994

THE ASSISTANT SECRETARY

Ms. Eleanor Chelimsky
Assistant Comptroller General
U.S. General Accounting Office
Washington, D.C. 20548

Dear Ms. Chelimsky:

This letter provides the Department of Education's (the Department's) comments on the draft General Accounting Office (GAO) report: Women's Educational Equity: Contradictions Exist Between Program Mandate and Operations, dated May 10, 1994. The report provides a useful analysis of the WEEA program, however, in some cases we would take issue with the emphasis or nuance of GAO findings.

Currently, WEEA is a modestly funded program (on average \$2.9 million/year during the years covered by the GAO report). Under the legislation, the Department is required to fund many different projects each year. These include both general significance and challenge grants to address announced priorities, including the six types of activities described in the legislation. Further, a variety of institutions are eligible for WEEA funds (including nonprofit organizations, community groups and individuals); grants must be distributed to achieve geographic diversity; and the program must give special consideration to applicants who have not previously been funded.

WEEA is clearly a program designed to generate and test new strategies for gender equity. Accordingly, the impact of WEEA projects should be measured less by systemic, institution-wide change than by success in building on these strategies -- for instance, whether a project continues even beyond its WEEA funding, is replicated elsewhere, or results in a product for dissemination.

In fact, GAO states that all WEEA projects it reviewed properly fell under the program's statutory authorization. Nevertheless, it concludes that "contradictions exist between [the] program mandate and operations" and that funded projects "may have had limited potential to further [the program's] purpose." Projects properly authorized by a statute, by definition, are carrying out the purpose of the statute.

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Appendix II
Comments From the Department of
Education

Page 2 - Ms. Eleanor Chelimsky

GAO's evidence shows that WEEA-funded projects do serve the purposes of the legislation. For instance, over 70 percent of applicants funded to develop educational materials produced products, and continue to offer those products to interested audiences. The catalogue distributed by the WEEA Publishing Center (WEEAPC) contains over 200 field-tested curricula, teacher training programs, Title IX manuals, history and social studies resources, mentoring programs, and other materials.

Almost one-half of projects funded by WEEA continue to provide services beyond the WEEA funding period. The Department provided information to GAO -- although not included in its report -- regarding examples of successful WEEA projects that resulted in strategies that were replicated beyond the original target audience. Examples of these projects are described in the Appendix.

GAO questions whether direct services -- instruction, counseling, day care, transportation -- to disadvantaged women and girls is the best type of activity for WEEA funds. GAO says such activities can be only tangentially related to promoting gender equity. However, the WEEA statute requires funding of direct services and activities, in particular to underemployed and unemployed women and girls, expressly as a means for providing gender equity.

In several respects, evidence from the program shows that such projects do promote gender equity. First, providing day care to women who cannot otherwise attend classes because of childcare responsibilities eliminates gender-based barriers that keep women from achieving. Second, numerous WEEA projects provided direct services not because women were in need, but to identify and combat gender-based barriers to women's and girls' success -- for instance, instructional activities funded to develop and demonstrate strategies to help girls overcome their well documented limited participation in higher-level mathematics and science classes.

Third, many WEEA projects provide, in addition to direct services, training for teachers and counselors or curriculum development, thus, increasing the likelihood for program continuation and institutional change through improved instructional and counseling practices and materials. Examples of WEEA projects clearly linked to the identification and elimination of gender-based barriers, as well as projects designed to change institutional practices, are discussed in the Appendix.

GAO's brief discussion of WEEA products and WEEA's dissemination efforts provides little information on one of the most important aspects of the WEEA program. I've detailed the full range of WEEA dissemination efforts in the Appendix. Briefly, I note that

See comment 1.

Page 3 - Ms. Eleanor Chelmsky

dissemination is accomplished primarily through WEEAPC. The WEEAPC sales catalogue includes a wide-range and number of WEEA funded products -- products such as an award winning film to encourage girls to explore nontraditional careers, a Title IX manual for ensuring sex-fair health services, and a step-by-step mentoring training program for minority career women.

WEEAPC extensively markets these products including working with organizations, such as the Desegregation Assistance Centers and the American Association of University Women, that also regularly disseminate WEEA information and materials. WEEAPC maintains a database of 20,000 organizations and individuals that have requested catalogues and ordered materials. While GAO states that unit sales are small, some products have sold thousands of units and overall sales continue to increase. WEEAPC is also an important resource center for research and information on emerging issues of gender equity. Through its link with EquityNet, WEEAPC shares resources with over 4000 organizations and individuals. Thus, through the mechanism of WEEAPC, information learned from individual WEEA projects reaches a national audience.

See comment 2.

GAO notes that WEEA provides more grants to nonprofit organizations than to state educational agencies or local educational agencies, entities that GAO concludes have "the greatest potential to promote systemic educational equity." The legislation and regulations establish the eligibility of nonprofit organizations. If such applicants submit higher ranking applications than those submitted by SEAs and LEAs -- determined by readers outside the program applying selection criteria that address, in part, how well the proposed project meets the purposes of WEEA -- the projects will be chosen over those of the SEAs and LEAs.

See comment 3.

The report should provide more specific information about several categorizations made by GAO. For example: How did GAO make its determination about the national or general significance of individual projects? How did GAO determine that most challenge grants were "conventional" and not innovative?

See comment 4.

As a final note, I wanted to respond to GAO's comment that the Department was "reluctant to allow GAO timely access to records." My understanding is that Department staff were cooperative and forthcoming. Within a week of our entrance conference with GAO, the Department provided GAO with, among other information, all WEEA program reports and lists of all WEEA grantees. One week later, the Department began making its program files available to GAO. One week after that, WEEAPC provided GAO with extensive data on WEEA products, sales, and marketing efforts. The only records that the Department was unable to provide in a timely manner were records destroyed under the Department's five-year record retention policy.

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GAO's Recommendations

GAO recommends that the Department should "act to rebuild the program." GAO also recommends that the Department name a Director with a mandate to encourage and fund WEEA applications that promote systemic gender equity in educational institutions. In addition, GAO recommends that the Department ensure that these goals are supported by adequate evaluation of funded projects and sufficient staff to administer the program.

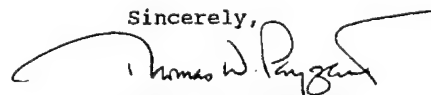
The Department has already proposed a new direction for, and commitment to, WEEA and has requested a significant budget increase to accomplish this goal. Well over a year ago, the Department itself assessed the WEEA program, including gathering feedback from WEEA grantees, interested groups and WEEAPC. Based on this assessment the Department determined that the WEEA program was crucial to the development of curricula and other educational materials and strategies designed to achieve gender equity. In addition, we determined that WEEA funding should also be provided directly to local schools and communities to assist in the implementation of effective gender-equity strategies.

Accordingly, the Department proposed to Congress that WEEA be reauthorized. We proposed that in addition to supporting research and development activities, the program make local implementation grants to assist schools and communities in ensuring that gender equity pervades their teaching and learning practices. The Department's proposal also includes a comprehensive evaluation provision. To support the reauthorized program, the Department's fiscal year 1995 budget request for WEEA is a better than 150 percent increase over the current funding level.

Decisions regarding staffing and the placement of the program within the Department will be considered in relation to reauthorization of all ESEA programs. Like all agencies, the Department is in the process of reinventing how it administers its programs. The flexibility to make appropriate staffing decisions is integral to the success of these efforts.

Thank you for your consideration of the Department's comments. Please contact Alicia Coro, at 260-3693, if you need any further information.

Sincerely,



Thomas W. Payzant

Enclosure

The following are GAO's comments on the June 13, 1994, letter from the Department of Education.

General Comments

The Department of Education, commenting on a draft of this report, reaffirmed its belief in the WEEA activities and projects it has funded. The Department states, first, that success in generating and testing new strategies for gender equity is more important than whether projects result in systemic, institutionwide change. Second, they maintain that projects "properly authorized by a statute, by definition, are carrying out the purpose of the statute." Third, the Department concludes that GAO's "evidence shows that WEEA-funded projects do serve the purposes of the legislation." Fourth, they argue that the statute requires funding of direct services and activities as a means for providing gender equity.

We agree that WEEA has funded useful activities and projects; however, our report questions the pronounced past emphasis in WEEA on providing services to compensate for past and possibly current educational inequities. The result is that relatively few WEEA resources are directed at identifying sex inequities in schools and colleges and developing remedies for those inequities. On the Department's first point, we saw no evidence to suggest that WEEA is generating and testing new strategies for gender equity.

Second, our point is that while the activities funded by WEEA are authorized by the statute, the mix of projects funded is such that issues of identifying and removing systemic barriers to sex equity are receiving much less emphasis under WEEA than those of providing services to a small number of persons. The result is that WEEA projects do little to reduce the negative impact of sex inequities in education for future generations of girls and women. We have expanded our discussion of these findings in the Implications and Conclusions section of the report. (See pp. 23-26.)

Third, the Department argues that the fact that over 70 percent of applicants funded to develop educational materials produced products and continued to offer them is evidence that WEEA projects serve the purposes of the legislation. We agree that this finding represents an accomplishment of the program, although we think that more than 15 percent of WEEA projects would result in commercially published products if they had the potential for replication and dissemination. The Department also cites our finding that almost half of projects providing student services continue beyond the WEEA funding period as evidence of

success. However, we also noted that these continuations were largely sponsored by state or other federal grants rather than being adopted as regular programs of local government agencies or the institutions receiving the WEEA grants.

Fourth, the act authorizes direct services such as instruction, counseling, day care, and transportation, but we see no basis for the Department's statement that the act "requires funding of direct services and activities." We believe the question of whether or not WEEA overemphasizes direct service activities deserves thoughtful consideration.

The Department also argues that our report provides little discussion of WEEA products and WEEA's dissemination efforts. We agree that there are strengths in the WEEA dissemination efforts: the WEEA Publishing Center actively seeks products to disseminate, works with grantees to make products marketable, publishes products commercially, and also performs useful coordination and technical assistance services. The dissemination effort would be improved if WEEA supported more projects with a favorable dissemination potential (supporting demonstration, developmental, and dissemination activities of national significance). Few new products have been developed for dissemination each year. Further, the value of Publishing Center products is uncertain because of the fact that WEEA grantees rarely submit products for dissemination that have been evaluated for their effectiveness in providing gender equity.

We recommended that the Department revisit the fundamental goals and strategies of the WEEA Program. In response, the Department stated that it had requested reauthorization of WEEA and increased funding and has determined that curriculum development and "implementation of effective gender equity strategies" are desirable. This does not appear to change the fundamental goals and strategies of the existing program. After years of reacting to a variety of external pressures, WEEA would benefit from a broader, constructive effort to determine how it can more effectively promote gender equity in education.

Specific Comments

1. The Department sent a description of projects, noting that they had provided this to us earlier but we did not include it in our report. We had reviewed this list earlier and found that many of the projects had been funded a decade ago and were thus outside the time period of our study. For the more recent projects, when we matched these descriptions with the information from project records, we decided to rely upon the

information in project records and from our telephone survey, both of which appeared to be the best sources of information on the nature and scope of the projects.

2. The Department argues that the application ranking process has produced the current balance of awards to nonprofit organizations and to state and local educational agencies. That may be true; however, our concern is that the application ranking process as it now works is not producing a set of funded projects that share a clear potential for reducing future gender inequities. There are too many factors to consider besides the merit of the application.

3. The Department requests that we explain how we determined the “national or general significance” of projects and how we determined that most challenge grants were “conventional” and not innovative.” We have expanded the text to clarify how the national or general significance categorizations were made. (See p. 16.) We have deleted the discussion about the extent of innovation among challenge grants.

4. The Department maintains that it provided all records us in a timely manner. Although we found the Department reluctant at first to allow us direct access to project records, we agree that this problem was resolved and did not result in substantial delays. We have deleted the comment concerning timely access from the report. However, the Department is not correct in stating that the only records it was unable to provide us were those that were destroyed under the Department’s 5-year record retention policy. As we note on page 3, the Department was able to provide us with only about half of the end-of-grant reports that were less than 5 years old at the time of our data collection.

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